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August 19, 2014

Via E-Mail and regular U.S. Mail

The Honorable Damon P. Martinez
United States Attorney
Office of the United States Attorney
P.O. Box 607
Albuquerque, NM 87102

Re: *United States v. Thomas R. Rodella and Thomas R. Rodella, Jr.*
Case No. 14-cr-2783; In the U.S. District Court for New Mexico

Dear Mr. Martinez:

This letter is to alert you that we will be seeking to pursue Hyde Amendment, 18 U.S.C. §3006(A) (codified as a note), remedies when the Rodellas prevail with acquittals at trial. As you know, Mr. Bowles and I have recently prevailed in being awarded attorney fees from the Government in the case *United States v. Funds in the Amount of \$427,456.00, et al*, Case No. 13-cv-00021, on our equal access to justice claim. Mr. Bowles was paid \$26,520 and I was paid \$56,980 after we established that we were without exception the prevailing party in the case involving Mr. Reza Ella. There, our hourly approved rate in that case were \$300 for Mr. Bowles and \$350 for myself. In this case we will be seeking \$400 an hour each.

We are confident that after we prevail on the merits that we will be able to demonstrate that the government acted in bad faith, maliciously and was vexatious. The basis for those assertions are twofold. First, we believe that exculpatory information was intentionally not presented to the grand jury. Second, we will present evidence that you have a personal vendetta against Sheriff Rodella following your May 7, 2014 meeting. As you will recall, that meeting was well attended by numerous officials from Rio Arriba County and you ordered that the meeting not be recorded. Notwithstanding that there is no verbatim transcript of the meeting, numerous officials will testify that you threatened Sheriff Rodella with arrest and prosecution if he were to “interfere” with the activities of U.S. Fish and Wildlife personnel. Multiple officials witnessed and will testify to your arrogant and vitriolic behavior during the meeting and what appeared to be your extreme hostility to Sheriff Rodella because he refused to capitulate to your unreasonable demands. Sheriff Rodella participated in the meeting, knowing that you had spearheaded multiple grand jury investigations against him, because that was his job as the duly elected

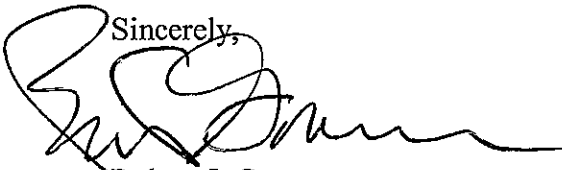
EXHIBIT A

Damon P. Martinez
United States Attorney
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Sheriff of Rio Arriba County. Obviously, both of these facts are now the reason for this woe begotten and ill-conceived indictment.

We will relinquish our Hyde Amendment claim if you dismiss the indictment by Friday, August 22, 2014. After that date, we will seek all of our fees even if the indictment is dismissed with prejudice prior to trial.

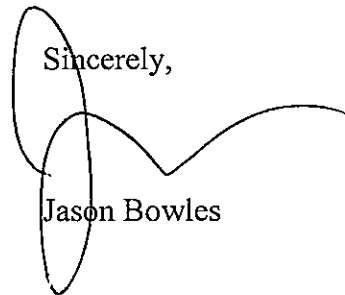
Sincerely,



Robert J. Gorence

RJG/mm

Sincerely,



Jason Bowles